

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

ROBERT EDGAR, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ANADARKO PETROLEUM
CORPORATION, R.A. WALKER, and
ROBERT G. GWIN,

Defendants.

Case No. 4:17-cv-01372

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on June 19, 2018, the Court granted Defendants' motion to dismiss the Corrected Amended Class Action Complaint without prejudice and with leave to amend by August 3, 2018;

WHEREAS, on August 3, 2018, Lead Plaintiff Iron Workers Benefit and Pension Fund—Iron Workers District Counsel Philadelphia & Vicinity filed its Second Amended Class Action Complaint in which two new Defendants, David McBride and John Christiansen, were added;

WHEREAS, on August 8, 2018, Messrs. McBride and Christiansen accepted service of the Second Amended Class Action Complaint through undersigned counsel;

THE PARTIES HAVE STIPULATED AND AGREED to, and respectfully request that the Court approve, the following schedule:

1. Defendants shall answer, move against, or otherwise respond to the second amended complaint by October 9, 2018;

2. If Defendants move to dismiss the second amended complaint, Lead Plaintiff shall have sixty (60) days from the filing of such motion in which to file any opposition papers. If Lead Plaintiff files opposition papers, Defendants shall have thirty (30) days from the filing of Lead Plaintiff's opposition papers in which to file reply papers;

3. Should any of the dates listed in the above periods fall on a Saturday, Sunday, or legal holiday, the period will continue to run until the end of the next day that is not a Saturday, Sunday, or legal holiday; and

4. Defendants expressly preserve, and do not waive, any and all rights and defenses, including but not limited to the assertion of jurisdictional defenses, either by motion or otherwise.

IT IS SO ORDERED:

Dated: _____

Hon. Lee H. Rosenthal
Chief United States District Judge

STIPULATED TO AND APPROVED BY:

THE ROSEN LAW FIRM, P.A.

/s/ Laurence Rosen

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August 10, 2018